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## FLICKER, GARELICK & ASSOCIA

ATTORNEYS AT LAW 45 BROADWAY NEW YORK, NEW YORK 10006

(212) 319-5240

FACSIMILE (212) 888-5271

office@flickergarelick.com

www.flickergarelick.com

MEMO ENDORS

May 15, 2008

NEW JERSEY OFFICE: PARK 80 WEST PLAZA II. SUITE 200 PMB 2008 SADDLE BROOK, NEW JERSEY 07663 (201) 291-2877

ANA M. GONZALEZ PARALEGAL

RICHARD L. GARELICK\* KENNETH M. SIMON\* ROBERT N. DENGLER\* BRENDAN E. McKEON<sup>†</sup> ERIC H. KIM⁴

KEITH L. FLICKER\*

OF COUNSEL CHARLES H. McAULIFFE+ \*ADMITTED IN N.Y. AND N.J. TADMITTED IN N.Y., N.J. AND CT

ADMITTED IN N.J.

ADMITTED IN N.Y., N.J. AND D.C.

VIA ECF and CERTIFIED MAIL - RRR

Honorable William H. Pauley III United States District Court Southern District of New York 500 Pearl Street, Room 2210 New York, New York 10007

> BBC Chartering & Logistic GmbH v. Usiminas Mecanica S/A, et al. Docket No.: 08-CV-00200 (WHP) Our File: 392-2

Dear Judge Pauley:

This firm represents Defendants Perini O&G, Perini Corporation and O&G Industries, Inc. (collectively "Perini") in the above-referenced matter. In that regard, I write to respectfully request an amendment to Your Honor's Scheduling Order of April 18, 2008.

The counsels for all parties have consented to a two-week extension to the time to serve the parties' motions, to March 30, In so far as the extension reduces the Plaintiff BBC Chartering's time to conduct jurisdictional discovery, the parties agree and request that Your Honor amend the Scheduling Order to reflect a two-week extension on all respective deadlines.



## FLICKER, GARELICK & ASSOCIATES, LLP

Honorable William H. Pauley III May 15, 2008 Page 2

Thank your for your courtesies.

Respectfully submitted,

FLICKER, GARELICK & ASSOCIATES, LLP

By: Keith L. Flicker

CC: VIA FACSIMILE: 212-370-4483
Lili F. Beneda, Esq
Condon & Forsyth LLP
7 Time Square, 18th Floor
New York, New York 10036

VIA FACSIMILE: 504-525-2456
Jason P. Waquespack, Esq.
Michael J. Nicaud, Esq.
Galloway, Johnson, Tompkins,
One Shell Square, 40th Floor
701 Poydras Street
New Orleans, Louisiana 70139

VIA FACSIMILE: 212-669-0698 Keith B. Dalen, Esq. Christopher M. Panagos, Esq. Hill, Rivkins & Hayden LLP 45 Broadway, Suite 1500 New York, New York 10006 SO ORDERED:

WILLIAM H. PAULEY III U.S.D.J.

wir & Smith 30, 2008

Plaint of shall conglete productional discovery by Ity 11,2008
Dendents shall like their motions

by My 11,2008

Plantiff shall serve and the is apposition by August 1,2007. Defendants shall serve and the any replies by Agust 15,2008. Oral agreet will remain on August 22,2008 at 1030 a.m.